

**UNITED DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Case No. 2:09-cv-12950-DML-VMM
)	Honorable David M. Lawson
UNITED STATES SECURITIES AND)	
EXCHANGE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	
)	
JOHN J. BRAVATA, RICHARD J.)	
TRABULSY, ANTONIO M. BRAVATA,)	
BBC EQUITIES, LLC, BRAVATA)	
FINANCIAL GROUP, LLC and SHARI A.)	
BRAVATA,)	
)	
Defendants.)	
_____ /)	
)	

RECEIVER’S MOTION FOR AUTHORITY UNDER HUNTINGTON ORDERS

Earle I. Erman, Receiver of BBC Equities, Inc. and Bravata Financial Group, files this Motion For Authority Under Huntington Orders (“Receiver’s Motion”) and states as follows:

1. On July 26, 2009, the United States Securities and Exchange Commission (the “SEC”) commenced a lawsuit in this Court against John J. Bravata, Richard J. Trabulsy, Antonio M. Bravata, BBC Equities, LLC (“BBC”), Bravata Financial Group, LLC (“Bravata”) and Shari A. Bravata. In its Complaint the SEC alleges that the BBC/Bravata Defendants engineered and executed a scheme to defraud investors in violation of the Securities Act of 1933, the Securities Exchange Act of 1934, and various regulations promulgated under that legislation.

2. On September 2, 2009, this Court entered the Receivership Order appointing Earle I. Erman (“Receiver”) as the Receiver of BBC Equities, Inc. and Bravata Financial Group LLC (“Receivership Entities”). The Receivership Order is preliminary and granted the Receiver the powers, authorities, rights, and privileges described within the order necessary to marshal and preserve the assets of the Receivership Entities and to prepare a report reflecting the existence, value, and location of all assets and liabilities of the Receivership Entities (the “Interim Report”).

3. On December 4, 2009, Receiver filed his Motion to Abandon Huntington Real Property and Request to Expedite the Date By Which Any Party Must Object to the Request for Relief to December 11, 2009 (the “Huntington Motion”).

4. No party objected to the Huntington Motion.

5. On January 13, 2010, this Court entered: 1) Order Granting the Receiver’s Motion to Abandon the Huntington Property in Ashland, Ohio and Amending the Temporary Restraining order, the Preliminary Injunction Order and the Order Appointing Receiver to Exclude the Huntington Property In Ashland, Ohio (the “Huntington Amberwood Order”); 2) Order Amending Temporary Restraining Order, Preliminary Injunction and Order Appointing Receiver in Regard to Certain Properties Located in Ohio and Florida Subject to Mortgages Held by Huntington National Bank (the “Huntington Timberstone Order”); and 3) the Order Granting the Receiver’s Motion to Abandon Huntington P&R and Rockland Property and Amending the Temporary Restraining Order, the Preliminary Injunction Order and the Order Appointing Receiver to Exclude the P& R and Rockland Properties Mortgaged to the Huntington National Bank (the “Huntington P&R and Rockland Properties”).

6. Pursuant to the Huntington Timberstone Order, the Huntington P&R Rockland Order and the Huntington Amberwood Order, the Receiver is authorized to provide an accounting to Huntington for the rents and other proceeds of the Huntington Abandoned Properties that are now, or hereafter come into, his possession or control (the "Accounting") (Tab 1). Huntington Timberstone Order, ¶ 4, the Huntington P&R Rockland Order ¶ 4 and the Huntington Amberwood Order ¶ 4.

7. The Receiver is also authorized to turnover to Huntington rents that come into the possession of the Receiver after January 13, 2010. Huntington Timberstone Order, ¶ 2, the Huntington P&R Rockland Order ¶ 2 and the Huntington Amberwood Order ¶ 2.

8. The Receiver has provided the Accounting to Huntington through January 13, 2010. Accordingly, the Receiver requests authority to turnover to Huntington the rents identified in the Accounting.

9. Huntington and the Receiver negotiated payment to the Receiver by Huntington to reimburse Erman Teicher and O'Keefe & Associates for certain administrative expenses of the investigation, review and analysis related to entry of the Huntington Timberstone Order, the Huntington P&R Rockland Order and the Huntington Amberwood Order. Erman Teicher and O'Keefe shall deduct the fees compensated by Huntington from future fee applications made in this matter by the Receiver and the Financial Advisor.

10. The fees are as follows: 1) Huntington Timberstone Order \$7,287.50 and \$6,443.00; 2) Huntington P&R Rockland Order \$13,245.00 and \$10,000; and 3) Huntington Amberwood Order \$1,917.50 and \$2,956.00. Huntington Timberstone Order, ¶ 5, the Huntington P&R Rockland Order ¶ 5 and the Huntington Amberwood Order ¶ 10.

11. Accordingly, the Receiver requests authority to pay \$22,450.00 to Erman Teicher and \$19,399.00 to O'Keefe and Associates.

12. The Receiver requests this Court enter an order in the form attached as Tab 2

13. The Receiver has sought concurrence from counsel for the Bravata Defendant and counsel for the SEC. Counsel for the SEC does not oppose the Motion. Receiver's counsel left a message for the Bravata Defendants' counsel but has not heard back from him.

Respectfully submitted,

BODMAN LLP

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January 22, 2010.

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**BRIEF IN SUPPORT OF RECEIVER'S MOTION
FOR AUTHORITY UNDER HUNTINGTON ORDERS**

Earle I. Erman, Receiver of BBC Equities, Inc. and Bravata Financial Group, files this Brief in Support of his Motion authority Under the Huntington Orders and relies on the Federal Rules of Civil Procedures, the terms of the Receivership Order, this Court's prior orders and applicable law.

Respectfully submitted,

BODMAN LLP

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 22, 2010 *Receiver's Motion for Authority Under Huntington Orders, Brief in Support and this Certificate of Service* was electronically filed with the Clerk of the Court for the United States District Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

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